

Frank J. Wright
State Bar No. 22028800
frank@fjwright.law
Jeffery M. Veteto
State Bar No. 24098548
jeff@fjwright.law
Law Offices of Frank J.
Wright, PLLC
1800 Valley View Lane, Suite 250
Farmers Branch, TX 75234
Telephone: (214) 935-9100

Jeffrey S. Levinger
State Bar No. 122588300
jlevinger@levingerpc.com
J. Carl Cecere (Of Counsel)
State Bar No. 24050397
ccecere@cecerepc.com
Levinger PC
1445 Ross Avenue, Suite 2500
Dallas, TX 75202
Telephone: 214-855-6817
Facsimile: 214-855-6808

Ryan Downton
State Bar No. 24036500
ryan@thetexastrialgroup.com
The Texas Trial Group, PC
875 Carr 694, Ste. 103
Dorado, Puerto Rico 00646
Telephone: 512-680-7947

Joshua N. Eppich
State Bar No. 24050567
joshua@bondellis.com
Christian Ellis
State Bar No. 24007154
christian@bondsellis.com
Eric T. Haitz
State Bar No. 24101851
eric.haitz@bondsellis.com
C. Joshua Osborne
State Bar No. 24065856
c.joshosborne@bondsellis.com
Bonds Elis Eppich Shafer Jones LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
Telephone: 817-405-6900
Facsimile: 817-405-6902

Counsel for With Purpose, Inc.

Counsel for WPI Collateral Management, LLC

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re: § Case No. 23-30246-MVL
§
WITH PURPOSE, INC., § Chapter 7
§
Debtor. §

CERTIFICATION TO COURT OF APPEALS BY ALL PARTIES

An Amended Notice of Appeal having been filed in the above-referenced matter on January 31, 2025 (Doc. 420), Appellants With Purpose, Inc. and WPI Collateral Management, LLC (collectively “Appellants”) and Appellees Scott M. Seidel, Trustee, Jackson Investment Group, LLC, and GloriFi Acquisitions, LLC (collectively

“**Appellees**”) hereby certify to the Court under 28 U.S.C. §158(d)(2)(A) that a circumstance specified in 28 U.S.C. § 158(d)(2)(A)(iii) exists, warranting a direct appeal to the United States Court of Appeals for the Fifth Circuit.

1. This certification arises in an appeal from the following orders entered by the United States Bankruptcy Court for the Northern District of Texas: (a) the oral bench ruling entered on December 6, 2025; (b) the Memorandum Opinion Denying Conversion to Chapter 11 and Granting the Trustee’s Compromise with Jackson Investment Group Pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure entered on January 22, 2025; (c) the Order Denying Motion to Convert Case to Chapter 11 entered on January 24, 2025; and (d) the Order Granting Trustee’s Motion for Approval of Compromise and Settlement With, and Sale to, Jackson Investment Group, LLC, entered on January 24, 2025 (collectively, the “Orders on Appeal”).

2. All of the Appellants and all of the Appellees jointly certify that an immediate appeal of the Orders on Appeal to the U.S. Court of Appeals to the Fifth Circuit may materially advance the progress of the case or proceeding in which the appeal is taken. *See* 28 U.S.C. § 158(d)(2)(A)(iii).

Dated: February 19, 2025

/s/ Ryan Downton

Ryan Downton
State Bar No. 24036500
ryan@thetexastrialgroup.com
The Texas Trial Group, PC
875 Carr 694, Ste. 103
Dorado, Puerto Rico 00646
Telephone: 512-680-7947

Respectfully submitted,

/s/ Frank J. Wright

Frank J. Wright
frank@fJwright.law
Jeffery M. Veteto
jeff@fJwright.law
Law Offices of Frank J. Wright, PLLC
1800 Valley View Lane, Suite 250
Farmers Branch, TX 75234
Telephone: (214) 935-9100

Joshua N. Eppich
joshua@bondellis.com
Christian Ellis
christian@bondsellis.com
Eric T. Haitz
eric.haitz@bondsellis.com
C. Joshua Osborne
c. joshos boroe@bondsellis.com
Bonds Elis Eppich Shafer Jones LLP
420 Throckmorton Street, Suite 1000
Fort Worth, Texas 76102
Telephone: 817-405-6900
Facsimile: 817-405-6902

Attorneys for Appellant WPI Collateral Management, LLC

/s/ *Davor Rukavina*
Davor Rukavina
drukavina@munsch.com
Thomas D. Berghman
tberghman@munsch.com
Munch Hardt Kopf & Harr, P.C.
500 N. Akard Street, Suite 4000
Dallas, Texas 75201

*Attorneys for Appellee Scott M. Seidel,
Trustee*

Jeffrey S. Levinger
jlevinger@levingerpc.com
J. Carl Cecere (Of Counsel)
ccecer@cecerepc.com
Levinger PC
1700 Pacific Ave., Suite 2390
Dallas, TX 75201
Telephone: 214-855-6817
Facsimile: 214-817-4509

Attorneys for Appellant With Purpose, Inc.

/s/ *Paul M. Rosenblatt*
Paul M. Rosenblatt
prosenblatt@ktslaw.com
Kilpatrick Townsend & Stockton LLP
1100 Peachtree Street NE, Suite 2800
Atlanta, GA 30309

Attorneys for Appellees
Jackson Investment Group, LLC
And GloriFi Acquisitions, LLC

CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2025, a true and correct copy of the foregoing document was served on all Notice Parties and all parties consenting to electronic service of this case *via* the Court's *ECF system* for the Northern District of Texas.

/s/ Frank J. Wright
Frank J. Wright